

CAUSE # _____

2016 FEB 25 PM 2:02

STEPHEN L. GLAHN
Plaintiff

CLERK OF COURT
UNITED STATES DISTRICT COURT

VS.

FOR THE

RAFAEL EDWARD CRUZ

NORTHERN DISTRICT OF TEXAS

AKA. SENATOR TED CRUZ, TEXAS

4-16CV-153-A

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes Stephen L. Glahn, hereinafter referred to as Plaintiff, born and raised in the United States of America and residing in the State of Texas since 1976, representing himself, files this Original Petition, complaining of Mr. Rafael Edward Cruz, also known as Senator Ted Cruz, hereinafter referred to as Defendant Cruz, with office at 3626 North Hall Street, Suite #410, Dallas, TX., 75219.

I.

Defendant Cruz assumed office as a United States Senator from the State of Texas on January 13th, 2013, while he was still a citizen and national of Canada. Defendant Cruz was born on December 22nd, 1970, in Calgary, Alberta, Canada, of parents Rafael Bienvenido Cruz, who was a citizen and national of the Country of Cuba at the time, and Eleanor Elizabeth (Darragh) Wilson, a citizen of the United States of America. Defendant Cruz's Father reportedly

left Cuba in 1957 to attend the University of Texas at Austin and reportedly received political asylum in the United States after his four-year visa expired. Father Cruz reportedly became a naturalized citizen of the United States in 2005. (Wikipedia, Exhibit A.) It is possible that the countries of Canada, Cuba and the United States, each and all, consider Father Cruz to be a citizen and national of that country. Plaintiff has read articles that report Rafael Bienvenido Cruz to have fought on both sides of the revolutionary war in Cuba that brought communist Fidel Castro to power. If true, then at one time Rafael Bienvenido Cruz was an enemy of the United States of America.

II.

Article I, Section 3 of the Constitution of the United States of America states: “No person shall be a Senator who shall not have attained to the age of thirty years, and been nine years a citizen of the United States and” The Constitution was signed by the Constitutional Delegates on September 17th, 1787 but did not take effect until ratified by nine of the thirteen states on June 21st, 1788. The “nine year” citizenship requirement as of September 17th, 1787 was not a minimal standard. The nine-year period would have started on September 17th, 1778, a date early in the Revolutionary War against the British Empire. It predates The Treaty of Paris, formally ending the American Revolutionary War and acknowledging the reality of existence of The United States of America and the recognition of same by Great Britain, executed on September 3, 1783. It predates the Articles of Capitulation signed on October 19th, 1781 between the victorious Americans and defeated British at Yorktown. The original intent of the framers of The Constitution is clear- only early “Three Percenters” need apply.

The framers wanted America's leaders to be only and exclusively American with no conflicting loyalties or citizenship. If they could have extended the nine year period they probably would have done so. Why should the United States of America make an exception for Defendant Cruz?

III.

Defendant Cruz's Canadian citizenship was still in full force and effect at the time of Defendant's assumption of the Office of Senator and was not revoked until May 14th, 2014 (Dallas Morning News, August 18th, 2013, Exhibit B).

IV.

It is unknown to Plaintiff at which time the concept of "Dual-Nationalism" became somewhat or generally recognized around the world. Each nation does have its rules, requirements and laws addressing the concept. After having fought and won a war against the British Empire, it was likely unacceptable to the framers of The Constitution that a person could be a citizen of that empire and the United States of America. If "Dual-Nationalism" did exist at the time The Constitution was created it is likely that the framers would have included specific provisions against it or outlawing it. The framers of The Constitution saw no need to specifically codify that a Canadian, who would be a subject of the British Empire at that time, could not become a Senator of The United States. Canada was a staging ground for invasion of the Colonies by British General Burgoyne during the Revolutionary War and would be a supporter of British efforts, including the defeat of American invasions, during the future War of 1812.

V.

Defendant Cruz reportedly claimed that he was unaware that he was a Canadian National prior to his election to The US Senate. Immigration is a hot-button topic in politics today with one of the concerns of many self-described conservatives being the existence of “Birthright Citizenship”. Illegal-alien expectant mothers can slip into the United States, give birth on US soil, and their newborn child is immediately a US citizen. It is inconceivable for Defendant Cruz to have never considered that Canada also follows the same rule of ‘Birthright Citizenship’. The cosmopolitan historical nature of the Cruz family highly suggests that they are and were knowledgeable of visitation, immigration, citizenship rules and laws of multiple countries. Defendant Cruz himself was a Canadian “anchor baby”. Is Defendant Cruz also of Cuban Nationality because his father was a Cuban National at the time of Defendant Cruz’s birth? If Defendant Cruz is to be taken at his word that his ignorance regarding his Canadian citizenship was true, a true conservative and adherent to the language and intent of The Constitution would have resigned immediately, in the opinion of this Plaintiff.

VI.

It is self-evident that the nine-year restriction was included to minimize the chances of an individual with divided or false loyalties, or perhaps none other than to himself, gaining the position of Senator of The United States of America. The founding fathers were aware of traitors and treasonous acts during the Revolutionary War and, knowing human nature, the possibility that future individuals of questionable loyalty could obtain positions of power. Defendant Cruz has represented the interests of Canada in pushing to give Canadian oil

sand strip-miners increased access to US markets, even though a new oil pipeline from North Dakota to markets in the south would have greatly benefitted American producers in North Dakota. This American-only pipeline, which would not have crossed international boundaries, would not have needed approval from the Department of State of the US Government. Defendant Cruz saw no reason to help American oil producers unless Canadians producers also benefitted. He viewed it as allowing Canadian oil or none at all.

VII.

In *Medellin v. Texas*, Defendant Cruz questionably represented the interests of Texas against The Federal Government and the administration of his former employer, President George Walker Bush, that, knowing human nature, exposed Texans and other Americans to likely retaliatory prosecutorial and judicial abuse when arrested and otherwise detained in foreign countries. After *Medellin*, why should Mexico or other countries timely report the arrest and incarceration of Texans or other American Citizens to the United States Embassy, or even report it at all? In pursuing some kind of misguided jingoism along the lines of “States Rights” Defendant Cruz put all Americans that travel internationally at risk.

VIII.

Defendant Cruz’s lobbied for the shutdown of the government of The United States of America in order to coerce The President of The United States NOT TO EXECUTE his duties concerning a law already in effect, the Affordable Care Act. This Plaintiff is not endorsing The Affordable

Care Act but believes that the proper time to stop questionable legislation is before it becomes law, or through the Courts after it becomes law. Impeding the function of the US Government and increasing the borrowing costs of the US Government, in order to stop the implementation, execution and enforcement of ANY law, is not an option.

IX.

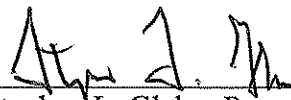
Defendant Cruz has also called for new Constitutional Amendments requiring more Judges to be subject to periodic elections and term limits. Defendant Cruz promises to prevent President Obama from appointing a new Justice to the US Supreme Court, a specific duty and responsibility of The President as described in The Constitution, putting That Court's activities into question for most of this coming year. It is possible that Defendant Cruz's party and America would be better served if the Republicans use their current position and power to influence the choice now. By waiting until after November of 2016, the Republicans may have much less influence on the eventual appointment.

Prayer for Relief

The sum of the actions of Defendant Cruz do not provide any justification, in the opinion of this Plaintiff and Petitioner, for The Court to take a more permissive view concerning the eligibility requirements for the position of Senator of the United States of America. The Plaintiff has the right to be represented by an individual in the US Senate that has unquestioned loyalty to only the United States of America and that geographic and political sub-division of America

known as the State of Texas, and is of unquestioned integrity, honesty and character. Prior to May 14, 2014, Defendant Cruz could make an equal argument that he was eligible to run and assume a nation-wide office in Canada. Should This Court decide that this nine year citizenship requirement is not germane for today's world, it opens the door further for multinationals and foreigners of wealth and power to obtain office and rule America for their own interests and purposes. Plaintiff respectfully requests that This Court remove Defendant Cruz from his position of United States Senator of the State of Texas and order the State of Texas to hold a new election to constitutionally install a new Senator that meets, at the very least, the 9-year Citizenship Constitutional requirement. Plaintiff also respectfully requests that This Court rule that Defendant Cruz is not eligible to become Senator unless through an election occurring after May 14th, 2023, nine years after his revocation of Canadian Citizenship and perhaps afterwards should Defendant Cruz be found to be a Citizen of Cuba.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Stephen L. Glahn", is written over a horizontal line.

Stephen L. Glahn, Pro-se,
P. O. Box 170623
Arlington, Texas 76003
817 714-1427

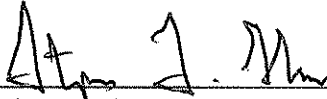
AFFADAVIT OF STEPHEN L. GLAHN

STATE OF TEXAS

COUNTY of TARRANT

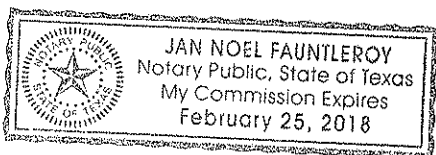
On this day Stephen L. Glahn appeared before me, the undersigned Notary Public, and after I administered an oath to him, upon his oath, he said:

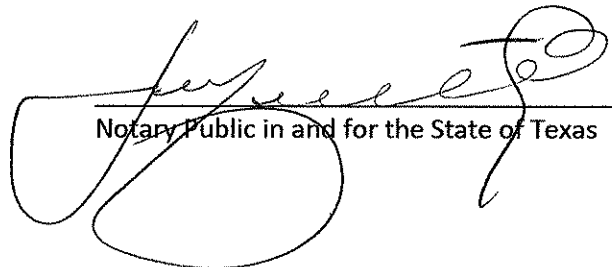
"My name is Stephen L. Glahn. I am a resident of Tarrant County, Texas, I have lived in Texas since 1976 and was born in The United States of America. The facts and evidence presented in this filing are true and correct to the best of my knowledge."



Stephen L. Glahn

Signed and sworn to before me this 25th day of February, 2016.





Notary Public in and for the State of Texas

Ted Cruz

From Wikipedia, the free encyclopedia

Rafael Edward "Ted" Cruz (born December 22, 1970) is an American politician and U.S. Senator from Texas. He is a Republican candidate for President of the United States in the 2016 presidential election.

Cruz attended elementary and high school in and around Houston, graduated from Princeton University in 1992, and then from Harvard Law School in 1995. Between 1999 and 2003, Cruz was the director of the Office of Policy Planning at the Federal Trade Commission, an associate deputy attorney general at the United States Department of Justice, and domestic policy advisor to President George W. Bush on the 2000 George W. Bush presidential campaign. He served as Solicitor General of Texas from 2003 to 2008, appointed by Texas Attorney General Greg Abbott. He was the first Hispanic, and the longest-serving solicitor general in Texas history. Cruz was also an adjunct professor of law from 2004 to 2009 at the University of Texas School of Law in Austin, where he taught U.S. Supreme Court litigation.

Cruz ran for the Senate seat vacated by fellow Republican Kay Bailey Hutchison, and in July 2012 defeated Lieutenant Governor David Dewhurst during the Republican primary runoff, 57%–43%. Cruz then defeated former state Representative Paul Sadler in the November 2012 general election, winning 56%–41%. He is the first Hispanic American to serve as a U.S. senator representing Texas, and is one of three Senators of Cuban descent. Cruz chairs the United States Senate Judiciary Subcommittee on Oversight, Federal Rights and Agency Activities, and is also the chairman of the United States Senate Commerce Subcommittee on Space, Science and Competitiveness. In November 2012, he was appointed vice-chairman of the National Republican Senatorial Committee.

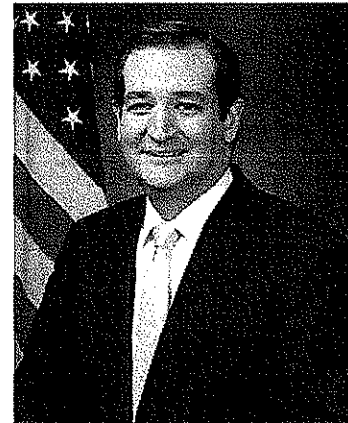
Cruz began campaigning for the Republican presidential nomination in March 2015. During the primary campaign, his base of support has been mainly among social conservatives, though he has had crossover appeal to other factions within his party.

^[2] His victory in the February 1, 2016 Iowa caucuses marked the first time a Hispanic won a presidential caucus.^{[3][4]}

Contents

- 1 Early life and family
- 2 Education
- 3 Legal career
 - 3.1 Clerkships
 - 3.2 Private practice
 - 3.3 Bush administration
 - 3.4 Texas Solicitor General
 - 3.5 Return to private practice
- 4 U.S. Senate
 - 4.1 2012 election
 - 4.2 Legislation
 - 4.2.1 Senate bill 2195
 - 4.2.2 Committee assignments
 - 4.3 Comments on President Obama
 - 4.4 Relationship with Republican members of Congress
- 5 Presidential campaign
 - 5.1 Citizenship
- 6 Political positions

Ted Cruz



United States Senator
from Texas

Incumbent

Assumed office

January 3, 2013

Serving with John Cornyn

Preceded by Kay Bailey Hutchison

Solicitor General of Texas

In office

January 9, 2003 – May 12, 2008

Governor Rick Perry

Preceded by Julie Parsley

Succeeded by James C. Ho^[1]

Personal details

Born Rafael Edward Cruz
December 22, 1970
Calgary, Canada

Political party Republican

Spouse(s) Heidi Nelson (m. 2001)

Children 2

Alma mater Princeton University
Harvard University

Religion Christianity (Southern Baptist)

Website Senate website
(<http://cruz.senate.gov>)
Campaign website
(<http://tedcruz.org>)

EXHIBIT "A"

- 6.1 Domestic affairs
- 6.2 Crime
- 6.3 Economy
- 6.4 Environment
- 6.5 Foreign affairs
- 7 Personal life
- 8 Accolades
- 9 Electoral history
- 10 See also
- 11 References
- 12 External links

Early life and family

Ted Cruz was born on December 22, 1970,^{[5][6]} at Foothills General Hospital^{[7][8]} in Calgary, Alberta, Canada, to parents Eleanor Elizabeth (Darragh) Wilson and Rafael Bienvenido Cruz.^{[9][10][11]} At the time of his birth, Cruz's parents had lived in Calgary for three years and were working in the oil business as owners of a seismic-data processing firm for oil drilling.^{[10][12][13][14][15]} Cruz has said, "I'm the son of two mathematicians/computer programmers."^[16] In 1974, his father left the family and moved to Texas.^[17] Later that same year, his parents reconciled and relocated to Houston.^[7]

Cruz's father was born in Cuba, and his grandfather was from the Canary Islands in Spain. His mother was born in Wilmington, Delaware, and is three quarters of Irish descent and one quarter of Italian descent.^{[18][19]} His father left Cuba in 1957 to attend the University of Texas at Austin and obtained political asylum in the United States after his four-year student visa expired.^[20] Rafael Cruz earned Canadian citizenship in 1973^[7] and ultimately became a naturalized U.S. citizen in 2005.^{[10][21][22][23]} His mother earned an undergraduate degree in mathematics from Rice University in the 1950s.^[24] Eleanor and Rafael Cruz divorced in 1997.^[25]

Cruz had two older half-sisters from his father's previous marriage, Miriam Ceferina Cruz and Roxana Lourdes Cruz. Miriam died in 2011.^{[25][26][27]}

Education

Cruz attended two private high schools: Faith West Academy in Katy, Texas^[28] and Second Baptist High School in Houston, from which he graduated as valedictorian in 1988.^{[21][29][30]} During high school, Cruz participated in a Houston-based group known at the time as the Free Market Education Foundation, a program that taught high school students the philosophies of economists such as Milton Friedman and Frédéric Bastiat.^{[15][31]}

Cruz graduated *cum laude* from Princeton University with a Bachelor of Arts in Public Policy^[32] from the Woodrow Wilson School of Public and International Affairs in 1992.^{[5][33]} While at Princeton, he competed for the American Whig-Cliosophic Society's Debate Panel and won the top speaker award at both the 1992 U.S. National Debating Championship and the 1992 North American Debating Championship.^[34] In 1992, he was named U.S. National Speaker of the Year, and with his debate partner David Panton won Team of the Year.^[34] Cruz and Panton would later represent Harvard Law School at the 1995 World Debating Championship, losing in the semi-finals to a team from Australia.^{[35][36][37]} Princeton's debate team named their annual novice championship after Cruz.^[37]

Cruz's senior thesis at Princeton investigated the separation of powers; its title, *Clipping the Wings of Angels*, draws its inspiration from a passage attributed to US President James Madison: "If angels were to govern men, neither external nor internal controls on government would be necessary." Cruz argued that the drafters of the Constitution intended to protect the rights of their constituents, and that the last two items in the Bill of Rights offer an explicit stop against an all-powerful state.^{[24][38]}

After graduating from Princeton, Cruz attended Harvard Law School, graduating *magna cum laude* in 1995 with a Juris Doctor degree.^{[5][39]} While at Harvard Law, he was a primary editor of the *Harvard Law Review*, and executive editor of the *Harvard Journal of Law and Public Policy*, and a founding editor of the *Harvard Latino Law Review*.^[33] Referring to Cruz's time as a student at Harvard Law, Professor Alan Dershowitz said, "Cruz was off-the-charts brilliant".^{[40][41][42][43]} At Harvard Law, Cruz was a John M. Olin Fellow in Law and Economics.^[44]

Cruz currently serves on the Board of Advisors of the *Texas Review of Law and Politics*.^[45]

Legal career

Clerkships

Cruz served as a law clerk to J. Michael Luttig of the United States Court of Appeals for the Fourth Circuit in 1995^{[44][46]} and William Rehnquist, Chief Justice of the United States in 1996.^[5] Cruz was the first Hispanic to clerk for a Chief Justice of the United States.^[47]

Private practice

After Cruz finished his clerkships, he took a position with Cooper, Carvin & Rosenthal, now known as Cooper & Kirk, LLC, from 1997 to 1998.^[48] While with the firm, Cruz worked on matters relating to the National Rifle Association, and helped prepare testimony for the impeachment proceedings against President Clinton.^[49] Cruz also served as private counsel for Congressman John Boehner during Boehner's lawsuit against Congressman Jim McDermott for releasing a tape recording of a Boehner telephone conversation.^[50]

Bush administration

Cruz joined the George W. Bush presidential campaign in 1999 as a domestic policy adviser, advising then-Governor George W. Bush on a wide range of policy and legal matters, including civil justice, criminal justice, constitutional law, immigration, and government reform.^[48]

Cruz assisted in assembling the Bush legal team, devising strategy, and drafting pleadings for filing with the Supreme Court of Florida and U.S. Supreme Court, in the case *Bush v. Gore*, during the 2000 Florida presidential recounts, leading to two wins for the Bush team.^{[44][51]} Cruz recruited future Chief Justice John Roberts and noted attorney Mike Carvin to the Bush legal team.^[49]

After President Bush took office, Cruz served as an associate deputy attorney general in the U.S. Justice Department^{[5][51]} and as the director of policy planning at the U.S. Federal Trade Commission.^{[5][40][51]}

Texas Solicitor General

Appointed to the office of Solicitor General of Texas by Texas Attorney General Greg Abbott,^{[46][52]} Cruz served in that position from 2003 to 2008.^{[31][44]} The office had been established in 1999 to handle appeals involving the state, but Abbott hired Cruz with the idea that Cruz would take a "leadership role in the United States in articulating a vision of strict construction." As Solicitor General, Cruz argued before the Supreme Court nine times, winning five cases and losing four.^[49]

Cruz has authored 70 United States Supreme Court briefs and presented 43 oral arguments, including nine before the United States Supreme Court.^{[40][46][53]} Cruz's record of having argued before the Supreme Court nine times is more than any practicing lawyer in Texas or any current member of Congress.^[54] Cruz has commented on his nine cases in front of the U.S. Supreme Court: "We ended up year after year arguing some of the biggest cases in the country. There was a degree of serendipity in that, but there was also a concerted effort to seek out and lead conservative fights."^[54]

In 2003, while Cruz was Texas Solicitor General, the Texas Attorney General's office declined to defend Texas' sodomy law in *Lawrence v. Texas*, where the U.S. Supreme Court decided that state laws banning homosexual sex as illegal sodomy were unconstitutional.^[55]



Ted Cruz speaking in Nashua, New Hampshire

In the landmark case of *District of Columbia v. Heller*, Cruz drafted the amicus brief signed by the attorneys general of 31 states, which said that the D.C. handgun ban should be struck down as infringing upon the Second Amendment right to keep and bear arms.^{[53][56]} Cruz also presented oral argument for the amici states in the companion case to *Heller* before the United States Court of Appeals for the District of Columbia Circuit.^{[53][57]}

In addition to his success in *Heller*, Cruz successfully defended the constitutionality of the Ten Commandments monument on the Texas State Capitol grounds before the Fifth Circuit and the U.S. Supreme Court, winning 5–4 in *Van Orden v. Perry*.^{[40][44][53]}

In 2004, Cruz was involved in the high-profile case, *Elk Grove Unified School District v. Newdow*,^{[40][44]} in which he wrote a brief on behalf of all 50 states which argued that the plaintiff did not have standing to file suit on behalf of his daughter.^[58] The Supreme Court upheld the position of Cruz's brief.

Cruz served as lead counsel for the state and successfully defended the multiple litigation challenges to the 2003 Texas congressional redistricting plan in state and federal district courts and before the U.S. Supreme Court, which was decided 5–4 in his favor in *League of United Latin American Citizens v. Perry*.^{[44][59]}

Cruz also successfully defended, in *Medellin v. Texas*, the State of Texas against an attempt to re-open the cases of 51 Mexican nationals, all of whom were convicted of murder in the United States and were on death row.^{[40][44][46][53]} With the support of the George W. Bush Administration, the petitioners argued that the United States had violated the Vienna Convention on Consular Relations by failing to notify the convicted nationals of their opportunity to receive legal aid from the Mexican consulate.^{[49][60]} They based their case on a decision of the International Court of Justice in the Avena case which ruled that by failing to allow access to the Mexican consulate, the US had breached its obligations under the Convention.^[61] Texas won the case in a 6–3 decision, the Supreme Court holding that ICJ decisions were not binding in domestic law and that the President had no power to enforce them.^{[49][60]}

Cruz has been named by *American Lawyer* magazine as one of the 50 Best Litigators under 45 in America,^{[52][62]} by *The National Law Journal* as one of the 50 Most Influential Minority Lawyers in America,^{[63][64]} and by *Texas Lawyer* as one of the 25 Greatest Texas Lawyers of the Past Quarter Century.^{[65][66]}

Return to private practice

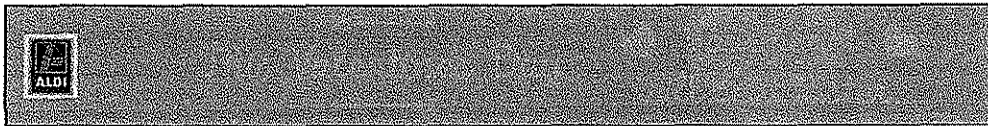
After leaving the Solicitor General position in 2008, Cruz worked in a private law firm in Houston, Morgan, Lewis & Bockius LLP, often representing corporate clients, until he was sworn in as U.S. Senator from Texas in 2013.^{[24][44][67]} At Morgan Lewis, he led the firm's U.S. Supreme Court and national appellate litigation practice.^[67] In 2009 and 2010, he formed and then abandoned a bid for state attorney general when the incumbent Attorney General Greg Abbott, who hired Cruz as Solicitor General, decided to run for re-election.^[21]

While at Morgan, Lewis, & Bockius, Cruz represented Pfizer in a lawsuit brought by a group of public hospitals and community health centers who accused the drug manufacturer of overcharging. The Supreme Court eventually threw the case out.^[68] Shandong Linglong Rubber Company was found guilty of marketing versions of tires that were based on blueprints stolen by a former employee of a Florida businessman and ordered to pay \$26 million to the Floridian. Cruz worked on the Chinese company's appellant brief. The appeals court denied the appeal and affirmed the jury's award.^[69] Cruz represented drug manufacturer B. Braun Medical Inc. in front of the U.S. Court of Appeals for the 6th Circuit after the company was found guilty of wrongfully discharging a former employee. Cruz asserted that she had failed to prove that B. Braun had directed her to violate the law and that she had not presented sufficient evidence that her refusal to violate the law was why she had been fired. The appeals court rejected Cruz's argument and affirmed the \$880,000 award.^[69] Cruz represented Toyota in an appeal to the Texas Supreme Court in an statute of limitations case, where a judge wanted to investigate Toyota for contempt after a former Toyota in-house lawyer accused Toyota of unlawfully withholding documents in a product liability case involving a quadriplegic.^[70] Cruz unsuccessfully argued the judge's jurisdiction expired thirty days after the case was dismissed following an out-of-court settlement, but later won on a second appeal using the same argument.^[71]

Cruz defended two record-setting \$54 million personal injury awards in New Mexico at the appellate level, including one which had been thrown out by a lower court.^[72] Cruz defended a mentally disabled man who was allegedly raped by an employee of the facility where he lived. And in the other case Cruz defended the family of a 78-year-old resident of an Albuquerque nursing home who died of internal bleeding.^{[72][73]} The settlements were sealed in both cases.^{[72][73]}



Cruz at the Values Voter Summit in Washington, DC., 2011



73° Wednesday, February 10, 2016

The Dallas Morning News

ePaper Subscribe Sign In

[Home](#) [News](#) [Business](#) [Sports](#) [Entertainment](#) [Arts & Life](#) [Opinion](#) [Obits](#) [Marketplace](#) [DMNstore](#)

[Communities](#) [Crime](#) [Education](#) [Investigations](#) [State](#) [Nation/World](#) [Politics](#) [Videos](#)



Search



[News > Politics > Trail Blazers Blog](#)

Trail Blazers Blog

No, Canada: Sen. Ted Cruz has formally shed his dual citizenship



Todd J. Gillman [Twitter](#) [Email](#)

Published: June 10, 2014 4:52 pm

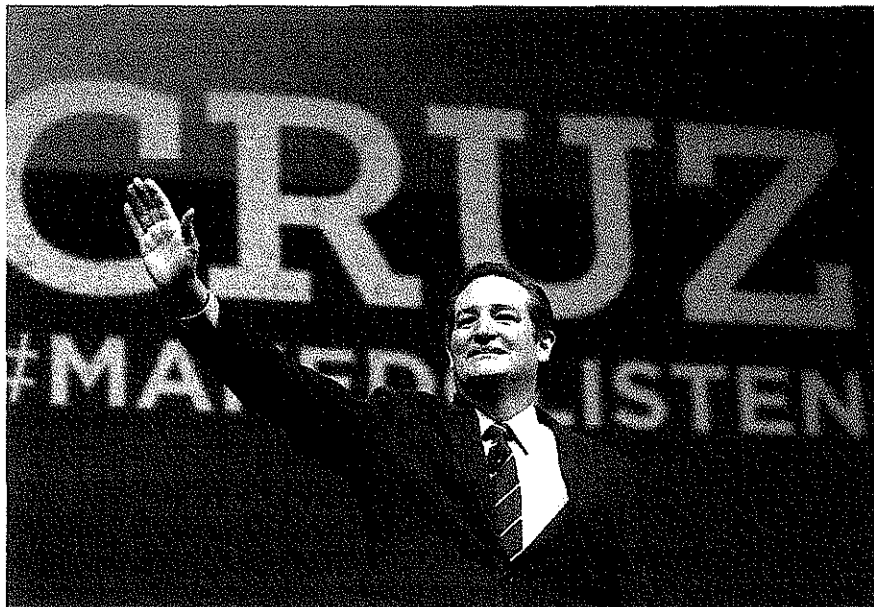
[Facebook](#)

[Twitter](#)

[Email](#)

[12 Comments](#)

[Print](#)



Sen. Ted Cruz at the Texas GOP Convention in Fort Worth last Friday.

Alberta-born Sen. Ted Cruz has given up his Canadian dual citizenship. The renunciation became official on May 14, roughly 9 months after he learned he wasn't only an American.

Cruz received notification by mail on Tuesday at his home in Houston.

"He's pleased to receive the notification and glad to have this process finalized," said spokeswoman Catherine Frazier.



**Kos/Danchak**
Audiology and Hearing Aids

Providing Complete Hearing Care.
That's what we do!

817.277.7039

101 W. Randol Mill Rd. • Arlington, TX 76011
[northtxhearing.com](#)

[CLICK HERE FOR MORE INFO](#) 

Archives

Select Month 

About this Blog

The blog for the Dallas Morning News politics team tracks Dallas Fort Worth area, Texas and national campaigns.



EXHIBIT "B"

Cruz's birth in Canada was never a secret. But it proved a political liability, with detractors taunting him as "Canadian Ted" and critics suggesting that his birthplace made him ineligible to run for president.

The dual citizenship came as a surprise to Cruz and his parents when The Dallas Morning News reported on it last August.

The senator provided a copy of his Canadian birth certificate at the time. He vowed almost immediately to shed his Canadian citizenship, and promised to tell *The News* first as soon as he succeeded.

"Nothing against Canada, but I'm an American by birth and as a U.S. senator, I believe I should be only an American," he said the day of the initial report.

[Canadian Renunciation Letter](#)

SHOW ME MORE LIKE CANADIAN RENUNCIATION LETTER
SIMILAR TO CANADIAN RENUNCIATION LETTER
BACK TO DOC

Browse more like [Canadian Renunciation Letter](#)

[Previous](#) | [Next](#)

[Voters List](#)

[Breitbart News](#)

[Obama NFA policy change 1-4-16](#)

[Law of Self Defense](#)

[Selective Service PSA - Non-Citizens It Is The Law](#)

[BirtherReport](#)

[Eleanor Darragh Birth Certificate](#)

[Breitbart News](#)

[ahmed mohamed attorney general opinion](#)

[Jason Koebler](#)

[Cruz Citizenship Timeline \(documented\)](#)

[jb uspu](#)

[Hillary Clinton's SCI Nondisclosure Agreement](#)

[DailyMail.com](#)

[ATF Guidance - Do I Need a License to Buy and Sell Firearms](#)

[arizonapolitics](#)

[Letter from State Department Regarding JCPOA](#)

[tellme](#)

[Donald Trump New York Voting Record](#)

Canadian law is similar to that in the United States. Citizenship is automatic for nearly everyone born on the country's soil, whether that person wants it or not, and without any need to request it. In theory, Cruz could have asserted the right to vote in Canada, or even to run for Parliament, and he could have received a Canadian passport.

Under U.S. law, a foreign-born baby is entitled to American citizenship if at least one parent is an American. That was the case for Cruz — and it's a crucial point if he makes a White House run in 2016, as is widely expected.

The U.S. Constitution requires a president to be a "natural born" citizen. The popular understanding has long been that this means being born on American soil. But Cruz was entitled to American citizenship at birth. Because of that, a strong legal consensus has emerged that Cruz is, in fact, eligible.

Video



More videos:



Politics Stories



Chris Christie ends his White House bid; Carly Fiorina also suspends campaign



Want to see a future president? Iowa and New Hampshire have all the luck



for GOP

Unwelcome wagon: Trump, Cruz rhetoric likely to discourage Hispanics from voting

Categories

Select Category

Mobile

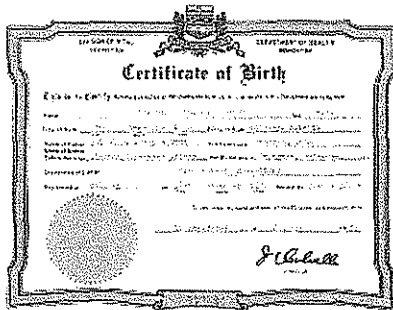
Get [dallasnews.com](#) on your mobile device

Newsletters

Subscribe to a variety of newsletters

That's something the tea party senator has in common with President Barack Obama, whose father was Kenyan but whose mother was from Kansas. So-called "birthers" have proposed that Obama was born in Kenya, not Hawaii. But even if true, he would have been an American at birth.

In December, Cruz said he had hired lawyers to assist in the effort to renounce his Canadian citizenship.



Canadian birth certificate for Sen. Ted Cruz

When he was born on Dec. 22, 1970, his parents were living in the Canadian oil patch in Calgary. His mother is a native-born American. His father, a Cuban émigré who later became a naturalized American, was still a Cuban citizen.

Cruz has said that when he was a child, his mother had told him she would have had to make an affirmative act to claim Canadian citizenship for him. Since that never happened, the family always had assumed that he did not hold Canadian citizenship.



Promoted Stories From The Web



A Ranking of the 2016 Presidential...

Forbes



What the Obamas Don't Want You to...

Radar Online - Photos



'How Stupid Is Iowa?'

The New York Times



25 Celebs Who Aren't Democrats

PrettyFamous

Recommended by

Editor Picks



Fumble!

Ex-TCU star Andy Dalton loses



Wide open spaces

Bigger than New York City and LA



Petal pushers

Cheap spots in Dallas-Fort Worth to



Decked out

New festival to turn Clyde Warren Park

JS 44-TXND (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Stephen L. Glahn

(b) County of Residence of First Listed Plaintiff

Tarrant

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Pro-se

DEFENDANTS

Rafael Edward Cruz
aka Senator Ted Cruz

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|---------------------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input checked="" type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

36 USC Article 1, Section 3, US Constitution

Brief description of cause:

Def. Cruz does not satisfy 9-year US Citizenship requirement remove

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED PENDING OR CLOSED CASE(S)

IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

2/25/2016

SIGNATURE OF ATTORNEY OF RECORD

Stephen L. Glahn

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) **Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) **County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) **Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. **Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. **Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. **Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. **Origin.** Place an "X" in one of the six boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- VI. **Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. **Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. **Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If a related case exists, whether pending or closed, insert the docket numbers and the corresponding judge names for such cases. A case is related to this filing if the case: 1) involves some or all of the same parties and is based on the same or a similar claim; 2) involves the same property, transaction, or event; 3) involves substantially similar issues of law and fact; and/or 4) involves the same estate in a bankruptcy appeal.

Attorney Signature. Date and sign the civil cover sheet.